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Attorneys for Defendant Thomas D. Halket

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

KIMBERLEE WILLIAMS, et al.,

Plaintiffs,

v.

BASF CATALYSTS LLC, et al.,

Defendants.

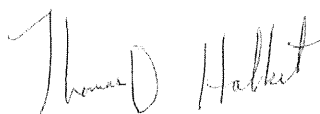
Civil Action No. 2:11-cv-1754 (SRC-MAS)

**DECLARATION OF THOMAS D.  
HALKET IN SUPPORT OF  
MOTION TO DISMISS SECOND  
AMENDED COMPLAINT PURSUANT  
TO FED. R. CIV. P. 12(b)(6)**

**THOMAS D. HALKET**, being of full age, upon his Declaration, says as follows:

1. I have been named as a Defendant in the above-captioned action. I am fully familiar with the facts set forth herein.
2. I submit this Declaration in support of the motion filed on my behalf for an Order dismissing the Second Amended Complaint pursuant to Fed. R. Civ. P. 12(b)(6).
3. The first day of my employment with Engelhard Corporation or any of its affiliates ("Engelhard") was on or about September 13, 1982. The last day of my employment with Engelhard was in or about January of 1986. My resignation from Engelhard in or about January of 1986 permanently severed my employment relationship with Engelhard.

I hereby declare that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

A handwritten signature in cursive script, appearing to read "Thomas D. Halket".

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THOMAS D. HALKET

DATED: September 17, 2015